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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
Preparation for the International Telecommunication Union World Radio Conferences	)	ET Docket No. 93-198

COMMENTS OF ORBITAL COMMUNICATIONS CORPORATION

Orbital Communications Corporation ("ORBCOMM"), a wholly-owned subsidiary of Orbital Sciences Corporation ("OSC"), hereby comments on the Notice of Inquiry addressing the upcoming World Radio Conferences ("WRCs").[1/] In the Notice, the Commission seeks input in order to develop U.S. positions at WRC-93, which will be setting the agendas for WRC-95 and WRC-97.

Due to the nature of its proposed services, ORBCOMM is very interested in this proceeding, and has participated actively in previous world radio conference proceedings at the Commission. ORBCOMM was formed by its parent company to enter the mobile satellite services business. Founded in 1982, OSC is one of the country's leading commercial space technology companies. It is

1/ Preparation for the International Telecommunication Union World Radio Conferences, ET Docket No. 93-198, FCC No. 93-328, released June 28, 1993 ("Notice").

engaged in design, manufacturing, testing and operation of space launch vehicles, suborbital tracking and data systems, and satellite based communications and remote sensing systems

Conference ("WARC-92") included consideration of a global allocation of spectrum below 1 GHz for non-geostationary mobile satellite services. ORBCOMM participated extensively in the FCC's proceedings to develop the U.S. proposals at WARC-92 on this matter. In addition, representatives from ORBCOMM served as advisors to the U.S. delegation at WARC-92, and participated in the conference in Torremolinos, Spain.

As a result of the work of ORBCOMM and the U.S. delegation, as well as the high level of interest from many other nations, WARC-92 allocated spectrum for non-geostationary mobile satellite services. WARC-92 designated some 9.9 MHz of spectrum below 1 GHz for non-geostationary mobile satellite services. However, only 3.6 MHz was allocated on a primary basis, with the other 6.6 MHz allocated on a secondary basis. Moreover, the need to share the spectrum with other services will constrain the capacity of the non-geostationary mobile satellite systems to use those allocations.

The spectrum allocated at WARC-92 for non-geostationary mobile satellite services will be adequate to support the initial needs of the current applicants before the FCC, as well as allowing some additional entry.[5/] Several parties have expressed an interest in this service to the Commission, and are expected to apply for FCC licenses.[6/]

5/ E.g., Negotiated Rulemaking Report at p. 7.

6/ An application was filed by Leosat Corporation, although it will not be considered with the current round of applications (continued...)

ORBCOMM's low-Earth orbit mobile satellite system promises to bring enormous benefit to consumers in the U.S. and elsewhere, as a result of its ability to provide near-ubiquitous

expressions of interest in such non-geostationary satellite systems by foreign countries.[7]

It thus appears likely that later in this decade demand for the spectrum will come to greatly exceed the limited supply that was allocated at WARC-92. ORBCOMM thus urges the U.S. at the upcoming WRC-93 to propose that the agenda for WRC-95 contain an item providing for additional spectrum allocations for non-geostationary mobile satellite services below 1 GHz. In particular, ORBCOMM suggests that the U.S. propose the allocation of no less than 10 MHz of spectrum below 1 GHz for non-geostationary mobile satellite services, along with an upgrade of the secondary allocations that were made at WARC-92. ORBCOMM will work with the U.S. government to attempt to identify specific candidate frequencies in advance of WRC-95.[8]

Attached as Appendix 1 is a suggested Draft Resolution that the Commission could proffer at WRC-93 to ensure that this

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7/ E.g., Mexico, Russia, Germany, Italy, Brazil, India, Australia and France have all expressed high levels of interest in potentially licensing non-geostationary satellite systems.

8/ In the Notice, the Commission sought comment on the advisability of placing on the agenda the various outstanding issues from prior WARCs. ORBCOMM urges the Commission to keep Resolutions 46 and 70 off of the agenda. ORBCOMM does not believe there is any urgency in addressing those resolutions, and they are likely to take up valuable time that could be much better spent with regard to U.S. interests. Given the other more important issues that the U.S. should seek to have addressed that were identified in the Notice, it would be counterproductive from the U.S. perspective to have these two Resolutions placed on the agenda for WRC-95. Similarly, ORBCOMM also urges the Commission to attempt to keep HF frequency and DAB (Sound) satellite planning off of the WRC-95 agenda, because of the lack of urgency and absence of information, and the limited time that will be available for more important issues from the U.S. perspective.

critical issue is addressed in a timely manner. In sum, ORBCOMM strongly urges the Commission to develop a U.S. policy in favor of seeking additional spectrum for non-geostationary satellite services below 1 GHz at WRC-95.

Respectfully submitted,

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Appendix 1

DRAFT Resolution
MSS Below 1 GHz
The World Radio Conference-93

Considering:

a. That the WARC-92 allocated 9.9 MHz below 1 GHz, for use by non-geostationary MSS satellite systems, of which 3.6 MHz was allocated as primary, and 6.3 MHz as secondary;

b. that these allocations have certain constraints as a consequence of sharing with other services;

c. that a number of satellite systems are proposed or are under construction by several administrations and are expected to fully utilize the available allocations before the Year 2000;

d. that there is a requirement to provide for growth in second generation systems and to accommodate additional systems;

e. that these non-geostationary MSS satellite systems offer low-cost, two-way data communication services, capable of servicing needs in developed and developing countries;

f. that a number of additional requirements are being identified for this type of system in many parts of the world; and

g. that techniques have been developed which permit the dynamic sharing of spectrum by such systems with existing services.

Recommends:

1. That the World Radio Conference-95 have on its agenda the allocation of no less than 10 MHz of additional spectrum below 1 GHz for the MSS for use by non-geostationary systems and the upgrade to primary allocation status of those portions of the spectrum allocated as secondary at WARC-92 for use by non-geostationary MSS satellite systems below 1 GHz; and

2. That the Radiocommunications Sector Study Groups be requested to urgently identify the possibilities for additional non-geostationary MSS allocations below 1 GHz and study questions related to sharing that may arise from such allocations.